UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC, Plaintiffs, v. YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC. Defendants.	ECF Case No. 1:07-cv-02103 (LLS) (FM) **MOTION FOR PRO HAC VICE ADMISSION OF REBECCA WEINSTEIN BACON**

JUL 24 2007

FILED U.S. DISTRICT COURT 2007 JUL 24 PM 2:30 S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Tonia Ouellette Klausner, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name:	Rebecca Weinstein Bacon
Firm Name:	Bartlit Beck Herman Palenchar & Scott LLP
Address:	54 West Hubbard Street
City/State/Zip:	Chicago, IL 60610
Phone Number:	(312) 494-4400
Fax Number:	(312) 494-4440

Viacom International, Inc. et al v. Youtube, Inc. et al Doc. 48

Ms. Bacon is a member in good standing of the Bar of the State of Illinois. There are no pending disciplinary proceedings against Ms. Bacon in any State or Federal court.

Date: July 24, 2007

Respectfully submitted,

Tonia Ouellette Klausner (TOK-8279)
WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
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Attorneys for Defendants YouTube, Inc., YouTube, LLC and Google Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC.

Defendants.

ECF Case

No. 1:07-cv-02103 (LLS) (FM)

AFFIDAVIT OF TONIA OUELLETTE KLAUSNER IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION OF REBECCA WEINSTEIN BACON

State of New York)
) ss:
County of New York)

Tonia Ouellette Klausner, being duly sworn, hereby deposes and says as follows:

1. I am associated with the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for defendants YouTube, Inc., YouTube LLC, and Google Inc. (collectively, "Defendants") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Rebecca Weinstein Bacon as counsel *pro hac vice* to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, where I was admitted to practice law in 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Ms. Bacon is a member of the law firm of Bartlit Beck Herman Palenchar & Scott LLP, in Chicago, Illinois. A true and correct copy of Ms. Bacon's Certificate of Good Standing is attached hereto as Exhibit "A".

4. I have found Ms. Bacon to be a skilled attorney and of high moral character.

5. Accordingly, I am pleased to move the admission of Rebecca Weinstein Bacon, *pro hac vice.*

6. I respectfully submit a proposed order granting the admission *pro hac vice* of Rebecca Weinstein Bacon, which is attached hereto as Exhibit "B".

WHEREFORE it is respectfully requested that the motion to admit Rebecca Weinstein Bacon, *pro hac vice*, to represent Defendants in the above-captioned matter, be granted.

Date: July 24, 2007
New York, New York

Tonia Ouellette Klausner

Sworn to before me this
24th day of July, 2007

Notary Public

MICHELLE DRUCKER
Notary Public - State of New York
NO. 01DR6114667
Qualified in Queens County
Commission Expires 8/23/08

ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

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Rebecca Weinstein Bacon
Bartlit Beck Herman Palenchar & Scott LLP
54 West Hubbard Street
Chicago, IL 60610-8174

Chicago
Wednesday, July 18, 2007

In re: Rebecca Weinstein Bacon
Admitted: 5/6/1999
Attorney No. 6257492

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: Roxanne Trenter
Roxanne Trenter
Deputy Registrar

RT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC.

Defendants.

ECF Case

No. 1:07-cv-02103 (LLS) (FM)

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Tonia Ouellette Klausner, attorney for defendants YouTube, Inc., YouTube, LLC, and Google Inc. (collectively, "Defendants"), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED THAT

Applicant's Name:	Rebecca Weinstein Bacon
Firm Name:	Bartlit Beck Herman Palenchar & Scott LLP
Address:	54 West Hubbard Street
City/State/Zip:	Chicago, IL 60610
Phone Number:	(312) 494-4400
Fax Number:	(312) 494-4440

is admitted to practice *pro hac vice* as counsel for Defendants in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. This action has been assigned to the Electronic Case Filing (ECF) system and as such, counsel shall immediately register for an ECF password.

Dated: July ____, 2007
New York, New York

____
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2007, I caused a true and correct copy of the Motion for Pro Hac Vice Admission of Rebecca Weinstein Bacon to be served via electronic mail on:

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Tonia Ouellette Klausner